REMARKS

Claims 1-9 and 11-13 are pending in the present application. Claims 1-9, and 11-13 have been amended. Claims 1-9 and 11-13 remain pending. Applicant's Attorney thanks Examiner Harrington for the Interview on October 18, 1999. The amendments and remainder of the remarks incorporate the substance of the interview.

The title has been changed to more clearly describe the present invention.

Independent claims 1, 8, and 13 have been amended to more clearly recite subject matter of the invention. The claims now include recitations for allowing a user navigates among the displayed images using the navigation control button and for allowing the user to randomly select one of the images to mark. Support for the amendments may be found throughout the Specification (e.g., page 15, line 15 and page 18, lines 12-14). References to not storing the mark information with the images have been cancelled.

The present invention provides a digital camera interface that includes a "mark" function for allowing a user to mark randomly chosen images to create a temporary group of images for collective manipulation. After marking the selected images, the user may perform functions on the group, such as deleting the group, or transforming the temporary group into a permanent group of images. This is contrast to conventional digital cameras in which operations *within the digital camera* had to be performed on a single image at time.

In the Office Action, the Examiner maintained the rejection of claims 1-3, 6-9, 11 and 13 under 35 U.S.C. 103(a) as being unpatentable over Parulski et al. (US Patent 5,633,678) (hereinafter "Parulski") in view of Steinberg (US 5,862,218), further in view of Nakano (US 5,043,816.

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It is respectfully submitted that in maintaining the rejection, the Examiner failed to address Applicant's amendments made in response the previous Office Action. More specifically, the Examiner failed to address the amendment made to the independent claims that a group of marked images is collectively manipulated by the *user within the digital camera.*

As stated in the previous amendment, the present invention enables a user of a digital camera a method of manipulating images within the camera as group, rather than one at a time, on a device lacking standard user interface tools, such as a keyboard. Examples of such group manipulation include deleting each image in the group, saving each image in the group into the same directory, or in the same file to create a slide show, duplicate each image in group, or automatically viewing each image in the group.

In contrast, both Parulski and Steinberg teach cameras that must be used with a host computer. It is respectfully submitted, therefore, that the references teach away from providing such complex group image manipulation within a digital camera.

Parulski teaches a camera that provides the user with the ability to categorize still digital images according to subject matter by tagging images. When the images are subsequently downloaded to the host computer, the user can select a particular category and download only the images which have a particular category identifier or the images can all be downloaded and stored in file folders labeled with each category name" (Col. 5, lines 3-8).

The Examiner contends that Parulski teaches group manipulation through marking, arguing that Parulski's "tagging" is the same as "marking," and that downloading a category of images is the same as a saving a group of marked images.

It is respectfully submitted that Parulski fails to render the claims of the present obvious for a variety of reasons. First, categorizing images does not perform the same function as

marking images. As pointed out in prior Amendments, Parulski's categorization inherently relates images by subject matter. This is a too restrictive approach for performing group manipulation functions as claimed in the present invention because a user may want to perform a function on a group of images that have no relation what so ever. For example, a user may want to delete, save, or play a random group of images that are from disparate categories. Marking provides such functionality, while subject-based categorization does not.

Even if Parulski's categorization was considered analogous to marking, Parulski fails to teach a categorization/marking function for group manipulation that is performed entirely "within the digital camera." First, in order to categorize images, Parulski requires that category names be entered on a host computer and then downloaded into the camera. The claimed "mark function," in contrast, requires no such host computer interaction.

Second, Parulski may teach a save category function, but once again the category or group of images is not saved within the digital camera, as recited in the claims of the present invention. Instead, Parulski's images are downloaded and saved on the host computer. By requiring a host computer, Parulski expressly teaches away from group manipulation of images within the camera, such as "duplicating" a group of images or saving the group of images as a new group, such as "slideshow," as recited in the dependent claims.

Steinberg fails to remedy the lack of teachings or suggestions of Parulski. Steinberg provides a method for verifying the authenticity of an image captured by a digital camera. However, the primary purpose of Steinberg, image authentication, is not performed "within the camera," as claimed, but must be done on the host computer after image acquisition and marking. Steinberg also teaches that the image marking is performed automatically by the camera during

image acquisition, rather than "randomly" by the user after images have been captured, as recited in the amended independent claims.

In addition to failing to teach group manipulation "within the camera," the references also fail to teach or suggest "allowing a user to navigate among the displayed images," and for "allowing the user to randomly select one of the displayed images" for marking to create a temporary group of images, as recited in the amended independent claims.

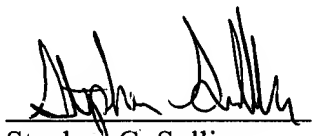
The references also fail to teach or suggest "providing the digital camera with "one or more function keys", and "assigning a mark function to one of the function keys...and assigning at least one group function to one of the function keys", as recited in the independent claims 1, 8 and 13. Rather, Parulski teaches that such complex functions would require the use of a host computer and could not be done on the camera itself.

Thus, Parulski in combination with the other references would still suffer the drawback that the present invention eliminates; creating a temporary group of images in a digital camera for collective manipulation by the user within the digital camera.

In view of the foregoing, it is submitted that independent claims 1, 8 and 13 are allowable over the cited references. Because the secondary references stand or fall with the primary references, claims 2-7 and 9, 11, and 12 are allowable because they are dependent upon the allowable independent claims. Accordingly, Applicant respectfully requests reconsideration and passage to issue of claims 1-9 and 11-13 as now presented.

Applicants' attorney believes that this Application is in condition for allowance. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

Respectfully submitted,



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